

Freedom Court Reporting, Inc

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF TEXAS
2 MARSHALL DIVISION
3 Case No. 2:08-cv-422 TJW

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5 DEPOSITION OF BETHANY J. MAYNARD
6 July 16, 2010

7 -----
8 PATTY BEALL, MATTHEW MAXWELL, TALINA McELHANY and
9 KELLY HAMPTON, individually and on behalf of all others
10 similarly situated,

11 Plaintiffs,

12 vs.

13 TYLER TECHNOLOGIES, INC., and EDP ENTERPRISES, INC.,

14 Defendants.

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16

17 APPEARANCES:

18 ZELBST, HOLMES & BUTLER, by
19 Ms. Chandra L. Holmes Ray
20 P.O. Box 365
21 411 Southwest Sixth Street
22 Lawton, Oklahoma 73502
23 Appeared on behalf of the Plaintiffs.

24 MORGAN, LEWIS & BOCKIUS, LLP, by
25 Mr. Paulo B. McKeeby
26 1717 Main Street, Suite 3200
27 Dallas, Texas 75201
28 Appeared on behalf of the Defendants.

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34 367 Valley Avenue B

EXHIBIT

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ma (877) 373-3660

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1 Q Where is your physical place of employment?

2 A Wauwatosa, Wisconsin.

3 Q How long have you been employed with Briggs &
4 Stratton?

5 A Since March of 2007.

6 Q And is that the job that you took after leaving
7 Tyler Technologies?

8 A Yes.

9 Q When you were employed with Tyler, did you refer to
10 your employer as Tyler or as Munis or as something
11 else?

12 A Munis.

13 Q Did you have an awareness I take it of the entity
14 Tyler Technologies while --

15 A Yes.

16 Q -- you were employed at Munis?

17 A Yes.

18 Q And what was your understanding as to the
19 relationship between Tyler and Munis?

20 A Munis is -- was a subsidiary of Tyler.

21 Q And you left -- I'm going to refer to it as Tyler
22 just because that's what I'm used to. Is that
23 acceptable?

24 A Sure, yes.

25 Q And you left Tyler in March of 2007; correct?

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1 A Yes.

2 Q And just so that we have the start date, would you

3 agree with me that your date of hire by Tyler was

4 December of 2002?

5 A Yes.

6 Q And your job at Tyler was implementation

7 specialist?

8 A Yes.

9 Q Would you agree with me that that was the only job
10 title that you had during your employment with
11 Tyler?

12 A That was my only job title, yes.

13 Q And to whom did you report as an implementation
14 specialist at Tyler?

15 A Jane Grant.

16 Q And did you report to Ms. Grant throughout the
17 tenure of your employment with Tyler?

18 A Yes.

19 Q And I understand that at least at the beginning
20 that you worked out of Tyler's office in Falmouth,
21 Maine?

22 A Yes.

23 Q Did that change during any time in your employment?

24 A Yes.

25 Q When did it change?

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1 STATE OF WISCONSIN)
2) SS.
2 MILWAUKEE COUNTY)

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4 I, Elaine A. Thies, RPR and Notary
5 Public in and for the State of Wisconsin, do hereby
6 certify that the preceding deposition was recorded by
7 me and reduced to writing under my personal
8 direction.

9 I further certify that said deposition
10 was taken at Gramann Reporting, Ltd., 710 North
11 Plankinton Avenue, Milwaukee, Wisconsin, on the 16th
12 day of July, 2010, commencing at 9:45 a.m. and
13 concluding at 12:06 p.m.

14 I further certify that I am not a
15 relative or employee or attorney or counsel of any of
16 the parties, or a relative or employee of such
17 attorney or counsel, or financially interested
18 directly or indirectly in this action.

19 In witness whereof, I have hereunto
20 set my hand and affixed my seal of office on this
21 26th day of July, 2010.

22

23

24 ELAINE A. THIES - Notary Public
In and for the State of Wisconsin

25 My commission expires 1-12-14.